

Exhibit 3

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

.....
STEPHEN McCOLLUM, STEPHANIE :
KINGREY, and SANDRA McCOLLUM, :
individually and as heirs :
at law in the Estate of :
LARRY GENE McCOLLUM, :
Plaintiffs, :
VS. : CIVIL ACTION NO.
: 3:12-cv-02037
BRAD LIVINGSTON, JEFF PRINGLE, :
RICHARD CLARK, KAREN TATE, :
SANDREA SANDERS, ROBERT EASON, :
THE UNIVERSITY OF TEXAS :
MEDICAL BRANCH and the TEXAS :
DEPARTMENT OF CRIMINAL JUSTICE, :
Defendants. :
.....

ORAL AND VIDEOTAPED DEPOSITION OF
THE DESIGNATED REPRESENTATIVE OF
THE UNIVERSITY OF TEXAS MEDICAL BRANCH
BY AND THROUGH
GLEND A ADAMS, M.D.

NOVEMBER 19, 2013

.....
ORAL AND VIDEOTAPED DEPOSITION OF THE DESIGNATED
REPRESENTATIVE OF THE UNIVERSITY OF TEXAS MEDICAL BRANCH
BY AND THROUGH GLEND A ADAMS, M.D., produced as a witness
at the instance of the Plaintiffs, and duly sworn, was
taken in the above-styled and numbered cause on Tuesday,
November 19, 2013, from 11:11 a.m. to 6:03 p.m., before
Mary C. Dopico, Certified Shorthand Reporter No. 463 and
Notary Public in and for the State of Texas, reported by
machine shorthand and audio/video recording at the
offices of Rebecca Sealy Hospital, 404 8th Street, Room,
4.204, Galveston, Houston, Texas, pursuant to Notice and
the Federal Rules of Civil Procedure and the provisions
stated on the record or attached hereto.

Stephen McCollum, et al v.
Brad Livingston, et al

Glenda Adams, M.D.
November 19, 2013

1 "effects of heat on patients with diabetes."

2 A. I didn't need to make any notes. As a
3 physician, I'm already generally familiar with those
4 three questions.

5 Q. Okay. What are the effects of heat on
6 patients with diabetes?

7 MS. COOGAN: Objection. You may recall,
8 Jeff, that the Court granted my objections to those
9 three, so that this witness is not being offered to
10 testify about those, and so she won't be testifying
11 about those. 23, 24 and 25.

12 Q. (By Mr. Edwards) Were you told not to put
13 down anything versus 23, 24 and 25?

14 A. No, I was not.

15 Q. And you understand that you're here to testify
16 solely as on behalf of the University of Texas Medical
17 Branch; correct?

18 A. Yes.

19 MR. EDWARDS: Kim, do you have a copy of
20 that order?

21 MS. COOGAN: I don't think I do.

22 MR. EDWARDS: Because I don't recall that
23 the Court prevented us from asking questions about the
24 effects of heat on patients with diabetes, hypertension,
25 or HCTZ, so --

17 WRIGHT WATSON & ASSOCIATES

18 (800) 375-4363 3307 Northland Dr., Ste. 185 Austin, TX 78731-4946 (512) 474-4363
19 ed4af7ad-12d7-431a-9322-dd8468e9e55c

1
2 Stephen McCollum, et al v.
3 Brad Livingston, et al

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211 Go ahead.

212 A. The autopsy report states that he died of
213 hyperthermia.

214 Q. (By Mr. Edwards) What is that?

215 A. Generally the definition of "hyperthermia"
216 requires a body temperature -- different definitions
217 give different ones -- somewhere between 103 and 105
218 degrees, with neurological deficits. You may have other
219 findings such as DIC.

220 Q. What do you -- What does UTMB contract
221 hyperthermia? You were the director, right, for medical
222 care?

223 MS. COOGAN: Objection, she is not here
224 to give you medical opinions, and she's not going to do
225 it pursuant to the Court's order.

226 Q. (By Mr. Edwards) Well, that's -- that's
227 inaccurate. Okay?

228 Because the question was: Why did he
229 die?

230 You said: He died from hyperthermia.

231 And I'm asking you what you consider
232 hyperthermia to be?

233 MS. COOGAN: I'm going to ask you not to
234 answer that question.

235 MR. EDWARDS: You're instructing --

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I, GLENDA ADAMS, M.D., have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted above.

Glenda Adams, M.D.

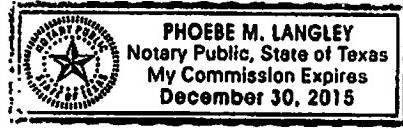
GLENDA ADAMS, M.D.

THE STATE OF Texas:

COUNTY OF Montgomery:

Before me, Phoebe M Langley,
on this day personally appeared GLENDA ADAMS, M.D.,
known to me or proved to me on the oath of
 or through
(description of identity card or other document) to be
the person whose name is subscribed to the foregoing
instrument and acknowledged to me that he\she executed
the same for the purpose and consideration therein
expressed.

Given under my hand and seal of office on this
30th day of December, 2013.



Phoebe M. Langley
NOTARY PUBLIC IN AND FOR

THE STATE OF Texas

My Commission Expires: 12-30-15

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13

REPORTER'S CERTIFICATION
TO THE
ORAL AND VIDEOTAPED DEPOSITION OF
THE DESIGNATED REPRESENTATIVE OF
THE UNIVERSITY OF TEXAS MEDICAL BRANCH
BY AND THROUGH
GLENDA ADAMS, M.D.
NOVEMBER 19, 2013

I, Mary C. Dopico, Certified Shorthand. Reporter
in and for the State of Texas, do hereby certify that
the facts stated by me in the caption hereto are true;
that the foregoing deposition of THE DESIGNATED
REPRESENTATIVE OF THE UNIVERSITY OF TEXAS MEDICAL BRANCH
BY AND THROUGH GLENDA ADAMS, M.D., the witness
hereinbefore named, was taken by me in machine
shorthand, the said witness having been by me first duly
cautioned and sworn to tell the truth, the whole truth,
and nothing but the truth, and later transcribed from my
machine shorthand notes to typewritten form by me.

I further certify that the above and foregoing

WRIGHT WATSON & ASSOCIATES

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1 deposition, as set forth in typewriting, is a full, true
2 and correct transcript of the proceedings had at the
time of taking said deposition.

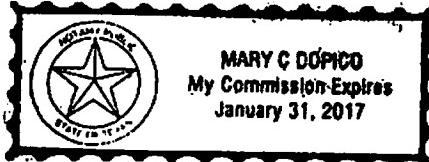
3 I further certify that pursuant to FRCP Rule
4 30(f)(1) that the signature of the deponent was
requested by the deponent or a party before the
completion of the deposition and returned within 30 days
5 from date of receipt of the transcript. If returned,
the attached Changes and Signature Pages contain any
6 changes and the reasons therefor;

7 _____ was not requested by the deponent or a party
before the completion of the deposition.
8

9 I further certify that I am neither attorney or
counsel for, nor related to or employed by any of the
10 parties to the action in which this deposition is taken,
and further that I am not a relative or employee of any
attorney or counsel employed by the parties hereto, or
11 financially interested in the action.

12 I further certify that charges for the preparation
of the foregoing completed deposition were \$ 1745.45
13 for the original thereof, charged to Attorney(s) for
Plaintiffs.
14

GIVEN UNDER MY HAND AND SEAL OF OFFICE this the 3rd
day of December, 2013.



Mary C. Dopico

Mary C. Dopico, CSR, RPR, CRR
CSR No. 463, Exp. 12-31-2014
Notary Public, State of Texas
Commission Expires 1-31-2017

Independent Contractor To:
Wright, Watson & Associates
Firm Registration No. 225
Expires 12-31-2013
3307 Northland Drive, Suite 185
Austin, Texas 78731
512/474-4363 Fax 512/474-8802

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